

REMARKS

In response to the Office Action dated November 3, 2004, Applicant respectfully requests reconsideration and withdrawal of the rejections of the claims.

Claims 1-5 were rejected under 35 U.S.C. § 101, on the grounds that they were alleged to be directed to non-statutory subject matter. The rejection states that these claims recite a computer program and a database, "which is non-statutory *functional* descriptive material" (emphasis added). It is respectfully submitted that claim 1 does not merely recite functional descriptive material. Rather, the claim recites concrete, tangible and useful elements, namely a computer interface that generates a display, and a "means", i.e. structure, that is responsive to the selection of a device listed in the display to generate a second display. These concepts are not merely abstract ideas. Rather, they constitute tangible representations of information, that a user can employ to configure a firewall. It is respectfully submitted, therefore, that the claimed subject matter falls within the statutory categories of patentable inventions defined in 35 U.S.C. § 101.

Nevertheless, to advance the prosecution of the application, claim 1 has been amended to explicitly recite that the claimed software tool is implemented in a computer, and that the claimed interface and means generate images on a display of the computer. These amendments are not intended to alter the substantive scope of the claim, but rather to present the claimed subject matter in a format that will remove the basis for the rejection. Reconsideration and withdrawal of the rejection is respectfully requested.

Claims 1-9 were rejected under 35 U.S.C. § 102 on the grounds that they were considered to be anticipated by the Antur et al. patent (US 6,212,558). As set

forth in MPEP Section 2131, to anticipate a claim, a reference must teach every element of the claim. For the reasons presented below, it is respectfully submitted that the Antur patent does not teach every element recited in the rejected claims, and therefore does not anticipate them.

Claim 1 recites a software tool for use in configuring firewalls. This tool includes an interface that communicates with a database to obtain the identification of firewall devices associated with a network, and to generate a first display which lists those devices. An example of such a display is illustrated in Figure 6A of the present application. In connection with this subject matter, the Office Action refers to Figure 6(c) of the Antur patent, as well as column 6, lines 47-55, and column 9, lines 5-10. Figure 6(c) of the patent illustrates an embodiment of Novell Directory Services which has been extended to include the firewalls.

Claim 1 further recites a means responsive to the selection of one of the devices in the displayed list to generate a second display which lists conduits within the selected firewall device. Each conduit is identified by descriptive names stored in the database for local and external devices, and or networks, that are logically connected by the conduit. An example of this second display is shown in Figure 6B of the application. In connection with the claimed second display, the Office Action refers to Figures 6(c) and 7 of the Antur patent. It is respectfully submitted that these figures do not depict the claimed subject matter. Specifically, the Antur patent does not disclose that, upon selection of one of the firewall devices illustrated in Figure 6(c), a listing of the conduits within that device is displayed, with each conduit being identified by descriptive names for the local and external devices that are logically connected by the conduit. Rather, as explained in the patent at column 9, line 22-26,

the screen display of Figure 7 illustrates the IP interface for a selected firewall. The patent does not discuss the conduits within the firewall. More particularly, it does not suggest that each conduit is identified by descriptive names for the local and external devices that are connected by the conduit.

For at least these reasons, therefore, the Antur patent cannot be interpreted to *anticipate* the subject matter of claim 1. For similar reasons, it also does not anticipate the method recited in claim 6.

In addition to these distinctions, other claimed features of the invention are likewise not anticipated by the Antur patent. For example, claim 2 recites means responsive to the selection of one of the devices listed in the first display to generate a third display which lists internal networks owned by an entity associated with the selected device. An example of this third display is illustrated in Figure 6C of the present application. As can be seen, this figure illustrates an example in which three networks associated with the website host who owns the selected firewall. The Office Action has not identified any figure of the Antur patent that illustrates a listing of this type of information in a display screen.

Claim 2 further recites means to selectively open and close conduits respectively corresponding to the internal networks. Claim 3 goes on to recite that these mean comprises a graphical object adjacent each listing of an internal network that can be selected by a user. These objects are depicted by the check boxes 56 in the example of Figure 6C in the application. Again, Applicant is unable to find a disclosure of this claimed subject matter in the Antur patent.

For at least the forgoing reasons, it is respectfully submitted that the subject matter of the pending claims is not anticipated by the Antur patent. If the rejection of


any of the claims is maintained, the Examiner is respectfully requested to identify, with particularity, where the claimed feature is disclosed, e.g. illustrated in the patent, or otherwise explain how the patent is being interpreted to suggest such a feature. It is respectfully submitted that a general reference to Figures 7-24 of the patent is not sufficient for Applicant to be able to understand how the patent is being interpreted relative to the specific features recited in the claims.

Reconsideration and withdrawal of the rejections and allowance of all pending claims are respectfully requested.

Respectfully submitted,

BURNS, DOANE, SWECKER & MATHIS, L.L.P.

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By: 
James A. LaBarre
Registration No. 28,632

P.O. Box 1404
Alexandria, Virginia 22313-1404
(703) 836-6620